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 9 *Attorneys for Defendant, LVMPD*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 Jeff Corbett, an individual; John Jenkins, an
 13 individual; Scott Murray, an individual; and
 14 David Newton, an individual,

15 Plaintiffs,

16 vs.

17 Public Employees' Retirement System, ex rel.
 18 State of Nevada; Las Vegas Metropolitan Police
 19 Department, a political subdivision of the State
 20 of Nevada; and Does I - X; inclusive,

21 Defendants.

22 Case No.:

23 Eighth Judicial District Court
 24 Case No.: A-20-822405-C

25 **DEFENDANT LAS VEGAS**
METROPOLITAN POLICE
DEPARTMENT'S NOTICE OF
REMOVAL TO FEDERAL COURT

26 TO: THE UNITED STATES DISTRICT COURT DISTRICT OF NEVADA.

27 Defendant Las Vegas Metropolitan Police Department ("LVMPD"), by and through its
 28 attorneys of record, Nick D. Crosby, Esq., of the law firm of Marquis Aurbach Coffing, hereby
 1 gives notice of removal of the above-captioned action from the Eighth Judicial District Court of
 2 Clark County, Nevada, to the United States District Court for the District of Nevada. Removal
 3 of this action is authorized under 28 U.S.C. §§ 1331, 1441, and 1446. The specific grounds for
 4 removal are as follows:

5 1. LVMPD is a defendant in the above-entitled action commenced in the Eighth
 6 Judicial District Court in and for the County of Clark, Case No. A-20-822405-C, Department 22,
 7 and is now pending in that court.

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1 2. Service of Plaintiffs' Complaint upon LVMPD was made on October 23, 2020
2 and service of Plaintiff's Amended Complaint upon LVMPD was made on November 19, 2020.
3 Electronically filed and served copies of the Complaint and Amended Complaint are attached
4 hereto as **Exhibit A** and **Exhibit B**, respectively.

5 3. Thirty days have not elapsed since LVMPD was served with the Complaint or
6 Amended Complaint in this action.

7 4. A true and correct copy of this Notice of Removal is being filed this date with the
8 Clerk of the Eighth Judicial District Court of Nevada.

9 5. Based on the foregoing, LVMPD removes the above action now pending in the
10 Eighth Judicial District Court of Nevada, in and for the County of Clark, as Case No. A-20-
11 822405-C, to this Court.

12 || 6. All served defendants have agreed to this removal.

Dated this 23 day of November, 2020.

MARQUIS AURBACH COFFING

By

Nick D. Crosby, Esq.
Nevada Bar No. 8996
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorney for Defendant, LVMPD

CERTIFICATE OF MAILING

I hereby certify that on the ____ day of November, 2020, I served a copy of the foregoing
NOTICE OF REMOVAL TO FEDERAL COURT upon each of the parties by depositing a
copy of the same in a sealed envelope in the United States Mail, Las Vegas, Nevada, First-Class
Postage fully prepaid, and addressed to:

Kevin B. Christensen, Esq.

Evan L. James, Esq.

Laura J. Wolff, Esq.

Christensen James & Martin, Chtd.

7440 W. Sahara Ave.

Las Vegas, NV 89117

Attorney for Plaintiffs

Steven D. Wolfson, D

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Vegas, NV 89155-2

torneys for Defendants.

Clark County

and that there is a regular communication by mail between the place of mailing and the place(s) so addressed.

An employee of Marquis Aurbach Coffing